REMARKS

In the non-final Office Action mailed January 9, 2012, claims 1, 8 and 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over European Patent Application No. EP1862982 (in the name of Garber et al.; hereinafter "Garber") in view of U.S. Published Patent Application No. 2004/0010708 (in the name of Johnson et al.; hereinafter "Johnson"); claims 3-5, 7 and 11-14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of U.S. Published Patent Application No. 2003/0001016 (in the name of Fraier et al.; hereinafter "Fraier"); claim 6 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of U.S. Published Patent Application No. 2003/0206107 (in the name of Goff; et al.; hereinafter "Goff"); and claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of U.S. Published Patent Application No. 2005/0162277 (in the name of Teplitxky et al.; hereinafter "Teplitxky"). Applicants respectfully traverse and request reconsideration.

Status of the Claims

Claims 1 and 3-14 are currently pending. Claim 2 was previously canceled and no claims have been withdrawn. Of the currently pending claims, claims 1, 8 and 10 are independent.

Interview

Applicants would like to thank Examiner Lane for the courtesies extended to Applicants' representative during the interview of May 2, 2012. During the interview, the parties discussed Applicants contention that the cited references fail to teach a media playing device comprising an RFID tag reader. The parties also discussed Applicants contention that, while Johnson appeared to teach a mapping of content (or "works") to access rights associated therewith, it fails to teach anything concerning a mapping between a static identifier and varying media identification information that identifies locations of media content. While Examiner Lane professed an

appreciation of Applicants arguments, he reserved the right to further consider the references to confirm Applicants interpretations thereof, and agreement as to the allowability of the claims was therefore not reached. Nevertheless, the insights provided by Examiner Lane have been very helpful in drafting the instant Response, and the remarks provided herein are believed to be in accordance with the observations made by both parties during the interview.

Rejections under Section 103

Claims 1, 8 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson. Before addressing the particular rejections, Applicants believe a brief discussion of the Garber and Johns references may prove instructive. Garber discloses an handheld RFID reader (FIGs. 13 and 14; ¶¶ 0063 and 0064) embodiment in which the reader can store identifications of RFID tag-equipped items whose locations are currently unknown (¶ 0067). Upon scanning an item having an ID matching one of the stored IDs, the reader can provide a signal to the user, thereby providing the user an indication as to the "location" of the previously lost item. (¶ 0067) Johnson teaches a computer system in which a data structure is provided whereby certain content items (works) are associated with corresponding access rights and the like. (¶¶ 0012-0014; FIG. 3)

With regard to claims 1, 8 and 10, Applicant first notes that each of these claims recites a mapping of static content identification information to varying media identification information, wherein the latter identifies a location of where media content is stored (or substantially equivalent expressions thereof). Thus, as discussed during the above-noted Interview, static content identification information obtained from an RFID tag-enabled object is used to obtain media content by virtue of the mapping between the content identification information and the varying media identification information, i.e., location information of the media content. In the rejections of claims 1, 8 and 10, the above-noted teachings of Johnson have been cited as reading

on the claimed mapping between static content identification information and varying media identification information that identifies a location of where media is stored. However, as further noted above, the teachings of Johnson have nothing to do with the *location* of media content, nor the mapping of such information to content identification information obtained from an RFID tag—at best, Johnson teaches mapping *rights* concerning media content to the works themselves. Furthermore, at best, Garber's teaching with regard to location of anything appear to be restricted to location of an RFID-equipped object, not media content.

Additionally, with regard to claim 8, Applicant notes that Garber and Johnson are completely silent with regard to *any* media playing device, much less one "having a radio frequency identification tag reader operatively coupled thereto."

In light of this, Applicant respectfully submits that the combination of Garber in view of Johnson fails to establish *prima facie* obviousness of claims 1, 8 and 10, which claims are therefore in suitable condition for allowance.

Claims 3-5, 7 and 11-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of Fraier. Claims 3-5, 7 and 11-14 are dependent upon, and therefore incorporate the limitations of, respective ones of claims 1 and 10. To the extent that Garber in view of Johnson fails to recite each and every limitation of claims 1 and 10, which deficiencies are not remedied by the further teachings of Fraier, Applicants respectfully submit that the combination of Garber in view of Johnson and in further view of Fraier fails to establish *prima facie* obviousness of claims 3-5, 7 and 11-14. For at least this reason, Applicants further submit that claims 3-5, 7 and 11-14 are therefore in suitable condition for allowance.

Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of Goff. Claim 6 is dependent upon, and therefore incorporate the limitations of, claim 1. To the extent that Garber in view of Johnson fails to recite each and every limitation of claim 1, which deficiencies are not remedied by the further teachings of Goff, Applicants respectfully submit that the combination of Garber in view of Johnson and in further view of Goff fails to establish *prima facie* obviousness of claim 6. For at least this reason, Applicants further submit that claim 6 is therefore in suitable condition for allowance.

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Garber in view of Johnson and in further view of Teplitxky. Claim 9 is dependent upon, and therefore incorporate the limitations of, claim 8. To the extent that Garber in view of Johnson fails to recite each and every limitation of claim 8, which deficiencies are not remedied by the further teachings of Teplitxky, Applicants respectfully submit that the combination of Garber in view of Johnson and in further view of Teplitxkyfails to establish *prima facie* obviousness of claim 9. For at least this reason, Applicants further submit that claim 9 is therefore in suitable condition for allowance.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully requests reconsideration and withdrawal all presently outstanding rejections. Thus, prompt and favorable consideration of this response is respectfully requested. If it is believed that personal communication will expedite prosecution of this application, Applicant's undersigned representative may be contacted at the number below.

Respectfully submitted,

/Christopher P. Moreno/

Date: 5/4/2012 By:_____

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